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1 Commonwealth that weighs more than that, you have to  
 2 get one of these permits?  
 3       **A. Basically, if you have a vehicle that runs**  
 4 **under 80,000, there's one set fee. If are you going**  
 5 **to haul up to 99,000, then you have to get a Mass.**  
 6 **overweight permit and a Massachusetts Turnpike**  
 7 **permit.**

8       Q. Now, you also identified as a location  
 9 where records are stored as a, I think you called it,  
 10 an office trailer?

11       **A. That is correct.**

12       Q. Have you looked at any of the records  
 13 contained in the office trailer in connection with  
 14 your work on trying to solve this flywheel housing  
 15 problem?

16       **A. No.**

17       Q. So you don't really know what's there  
 18 because you haven't looked at them; right?

19       **A. Well, I've visually seen them. I haven't**  
 20 **looked at all of them individually, no. I know**  
 21 **they're work orders.**

22       Q. Well, have you looked at any of them  
 23 individually in connection with your work?

24       **A. Not as of this time, no.**

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1       Q. Now, you referred to it as an office  
 2 trailer. Who has their office in that trailer?  
 3       **A. Absolutely no one.**  
 4       Q. Is that trailer supplied with electricity?  
 5       **A. Only if you run an extension cord to it.**  
 6       Q. Is there a photocopy machine in that  
 7 trailer?

8       **A. No.**

9       Q. Is there a desk in it?  
 10       **A. Yes, I believe there is.**

11       Q. Is there any kind of scanning device in  
 12 it?

13       **A. No.**

14       Q. Is there a telephone line to it?

15       **A. No.**

16       Q. Is it heated?

17       **A. Don't really know.**

18       Q. Does anyone at Trans-Spec actually work in  
 19 that trailer?

20       **A. No.**

21       Q. Are the records that are kept in that  
 22 trailer contained in cardboard boxes?

23       **A. Yes, they are.**

24       Q. And are those cardboard boxes stacked  
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1 against the walls?  
 2       **A. Yes, they are, by the month.**  
 3       Q. About how many cardboard boxes stacked  
 4 against the walls are there in that trailer?  
 5       **A. I really couldn't tell you. Maybe 50 or**  
 6 **more boxes. I don't know. Stacks of four or stacks**  
 7 **of five. I'm not sure.**

8       Q. When was the last time that an official  
 9 from the Department of Transportation came to  
 10 Trans-Spec to examine documents that are stored in  
 11 that office trailer?

12       **A. The end of 2004, a DOT inspection.**

13       Q. And how long did the inspection last?  
 14       **A. Just about a week.**  
 15       Q. And were copies made of the documents kept  
 16 in the office trailer?

17       **A. No.**

18       Q. Did DOT take any of those documents away  
 19 with them?

20       **A. No. They go through them all and enter**  
 21 **their data into their laptops.**

22       Q. When that inspection occurred, how many  
 23 days' notice did you receive that it was going to  
 24 occur?

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1       **A. I don't know. They sent a letter out**  
 2 **stating they'd be there. I would say it was about a**  
 3 **week's notice, if that. Could have been longer.**  
 4 **They're the government. They basically do what they**  
 5 **want.**

6       Q. What use does Trans-Spec make in the  
 7 day-to-day operations of its business of the records  
 8 that are stored in that office trailer?

9       **A. I couldn't tell you.**

10       Q. Do you know whether Trans-Spec makes any  
 11 use of records kept in that storage trailer?

12       **A. Once again, I couldn't tell you.**

13       Q. Are the records kept in that office  
 14 trailer generally at least two years old?

15       **A. I believe they're longer than that. They**  
 16 **go back -- I think they have to be kept for -- I**  
 17 **don't know how many years. The Secretary of State**  
 18 **requires you keep them.**

19       Q. I understand some of them are more than  
 20 two years old. But my question was, are they at  
 21 least two years, two years old or older?

22       **A. I would say so.**

23       Q. Mr. Samito asked you whether statements  
 24 that Trans-Spec said in answers to interrogatories  
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1       were made at the July 6, 2004, dyno tests might have  
 2 been made to someone other than you. Do you remember  
 3 that question?

4       **A. Uh-huh.**

5       Q. Who else from Trans-Spec was present for  
 6 that dyno testing?

7       **A. I believe I was -- I don't -- I believe I**  
 8 **was the only one there.**

9       Q. Take a look at Exhibit 1. I just have a  
 10 few questions about this and then we'll be done.

11       On the November 26, 2003, page,  
 12 there's an entry on there that says "Butch/Hollywood  
 13 (phonetic) and two girls in service truck, need to  
 14 take action." What is that about?

15       **A. That was a mechanic and a dispatcher. The**  
 16 **mechanic had a road call to go on and he allegedly**  
 17 **took two girls with him. The mechanic and the**  
 18 **dispatcher and two girls took the service truck and**  
 19 **went and did a road call somewhere. It was brought**  
 20 **to my attention.**

21       Q. On the December 24, 2003, sheet, there's a  
 22 reference to -- right up at the top, it says, "6100  
 23 done," and then it says "Bring in 7100, trans popping  
 24 out of gear." Do you see that?

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1       **A. Uh-huh.**

2       Q. The answer is yes?

3       **A. Yes. Getting a little tired.**

4       Q. Understandable. Is it your understanding  
 5 that Trans-Spec had repeated problems with the  
 6 transmissions in these trucks?

7       **A. Not to my knowledge.**

8       Q. Have you ever made any effort to review  
 9 Trans-Spec's repair orders or repair records to  
 10 determine the frequency with which it had significant  
 11 transmission problems with these trucks?

12       **A. No.**

13       Q. Do you know whether it had significant  
 14 transmission problems with more than 50 percent of  
 15 them during the --

16       **A. Not to my knowledge.**

17       Q. Okay. If it did during the first two  
 18 years that it had these trucks, would that strike you  
 19 as an unusual number of transmission problems?

20       MR. SAMITO: Objection.

21       **A. I wouldn't have any knowledge of it in the**  
 22 **first two years, because I wasn't there.**

23       Q. And you've never asked anyone at  
 24 Trans-Spec whether they had had transmission problems  
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